

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

MOUNTAIN VALLEY PIPELINE, LLC,

Plaintiff,

v.

CIVIL ACTION NO 5:23-CV-00625

MELINDA ANN TUHUS, and
ROSE ZHENG ABRAMOFF

Defendants.

JOINT SUBMISSION OF SETTLEMENT TERM SHEET

Pursuant to this Court's directive that the parties supplement the joint stay application, the parties jointly file the following statement of settlement terms:

1. Defendants Tuhus and Abramoff will consent to entry of a permanent injunction order prohibiting their unauthorized access or entry onto any MVP property or project anywhere, including access roads and rights of ways, or interference with any MVP operations, activities, or property in any state.
2. Any and all claims by and between the parties and their subsidiaries will be dismissed and fully released without the payment of consideration by either side.
3. Any and all claims for attorney fees or costs by either side will be waived and released. Expert witness depositions fees will be addressed separately.
4. The Complaints against Defendants Tuhus and Abramoff will be dismissed with prejudice.

MOUNTAIN VALLEY PIPELINE, LLC

By Counsel,

/s/ Timothy M. Miller (with permission)

Timothy M. Miller (WVSB #2564)

Matthew S. Casto (WVSB #8174)

Robert M. Stonestreet (WVSB # 9370)

Jennifer J. Hicks (WVSB # 11423)

Austin D. Rogers (WVSB #13919)
Babst Calland, P.C.
300 Summers Street, Suite 1000
Charleston, WV 25301
Telephone: 681.205.8888
Facsimile: 681.205.8814
tmiller@babstcalland.com
mcasto@babstcalland.com
rstonestreet@babstcalland.com
jhicks@babstcalland.com
arogers@babstcalland.com

**MELINDA ANN TUHUS and
ROSE ZHENG ABRAMOFF,**

By Counsel,

/s/ William V. DePaulo
William V. DePaulo, Esq. (WVSB #995)
860 Court Street North
Suite 300
Lewisburg, WV 24901
Tel: 304-342-5588
Fax: 866-850-1501
Mobile: 304-541-1984
william.depaulo@gmail.com

/s/ Jonathan Sidney
Jonathan Sidney
Pro Hac Vice
Colorado Bar No. 52463
Ohio Bar No. 0100561
Climate Defense Project
P.O. Box 97
Forest Hill, WV 24935
jsidney@climatedefenseproject.org
(510) 318-1549

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY**

MOUNTAIN VALLEY PIPELINE, LLC,

Plaintiff,

v.

CIVIL ACTION NO 5:23-CV-00625

MELINDA ANN TUHUS, and
ROSE ZHENG ABRAMOFF

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing supplemental statement was filed electronically with the Clerk of the Court, this 31st day of January, 2025, and thereby served on Counsel for the Plaintiff as follows:

Timothy M. Miller (WVSB #2564)
Matthew S. Casto (WVSB #8174)
Robert M. Stonestreet (WVSB # 9370)
Jennifer J. Hicks (WVSB # 11423)
Austin D. Rogers (WVSB #13919)
BABST CALLAND, P.C.
300 Summers Street, Suite 1000
Charleston, WV 25301
Telephone: 681.205.8888
Facsimile: 681.205.8814

/s/William V. DePaulo
William V. DePaulo